

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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In re: Adrian Jordan Montgomery and,  
Chauncey Syvoata Montgomery,  
Debtors.

Case No.: 18-23813-beh  
Chapter 13

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**OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

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Adrian Jordan Montgomery and Chauncey Syvoata Montgomery have filed an objection to the Motion For Relief From Automatic Stay in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.**

NOW COMES the above-named Debtors Adrian Jordan Montgomery and Chauncey Syvoata Montgomery, by and through their Attorneys, MILLER & MILLER LAW, LLC, and by Attorney Joshua C. Rittberg, hereby objects to the Motion for Relief from Automatic Stay of U.S. Bank National Association. As grounds for such objection and requests, the Debtor asserts as follows:

1. Debtors admit to falling behind on payments. Along with unexpected car repairs, the COVID-19 pandemic resulted in a loss of hours at work.
2. Debtors will resume their monthly mortgage payments.

WHEREFORE, the Debtors request that the Court deny U.S. Bank National Association's Motion to Lift the Automatic Stay and further request that this matter be set for a hearing.

Dated at Milwaukee, Wisconsin this 21<sup>st</sup> day of September 2022.

/s/ *Joshua C. Rittberg*

Joshua C. Rittberg  
MILLER & MILLER LAW, LLC  
Attorney for Debtors

MILLER & MILLER LAW, LLC  
633 W. Wisconsin Ave., Suite 500  
Milwaukee, WI 53203  
(414) 277-7742

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**CERTIFICATE OF MAILING**

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STATE OF WISCONSIN      )  
                                ) SS  
MILWAUKEE COUNTY      )

Elizabeth Alaniva, being sworn states that on September 21, 2022, I mailed properly enclosed in a postpaid envelope, an Objection to U.S. Bank National Association's Motion for Relief From the Automatic Stay, to the following named persons at their proper post office address after their respective names:

Adrian Jordan Montgomery  
Chauncey Syvoata Montgomery  
4865 N 78th St  
Milwaukee, WI 53218

Attorney Jay Pitner – via ECF

Trustee Scott Lieske - via ECF

U.S. Bankruptcy Trustee - via ECF

Subscribed and sworn to before  
me this 21<sup>st</sup> day of September 2022.

/s/ Joshua C. Rittberg  
Joshua C. Rittberg  
Notary Public, State of Wisconsin  
My commission is permanent

/s/ Elizabeth Alaniva  
Elizabeth Alaniva  
MILLER & MILLER LAW, LLC  
633 W Wisconsin Ave - Ste 500  
Milwaukee, WI 53203